

**California Water Fix RDEIR/SDEIS Review
Comment Form**

Document: July 15, 2015 Public Draft—RDEIR/SDEIS Section 5

Comment Source: *California Department of Fish and Wildlife*

Submittal Date: *October 30, 2015*

No.	Page	Line #	Comment	ICF Response
1	5-6	Table 5.2.1-1	The Lindsey Slough project has been completed. The table name and accompanying note state that these projects may apply toward meeting the conveyance project's Environmental Commitments, but many of these are described in preceding text as being a part of Cal EcoRestore, suggesting they would not be means to meet Alt. 4A's Environmental Commitments. Please clarify.	
2	5-6	1-6	The text states that concurrent project effects will not occur under the non-HCP alternatives because these new alternatives do not contain the CMs. However, the preceding text and following table identify projects that may occur under Cal EcoRestore during the construction period for the conveyance. Modeling assumes that in the near term 25,000 acres of tidal restoration will occur, as well as Yolo improvements. Please clarify or confirm how these projects are considered as potential cumulative projects for the non-HCP alternatives.	
3	5-129	8-16	CDFW staff made substantial comments on Section 4.3.8 (Alt 4A, Terrestrial Biological Resources) regarding the adequacy of proposed mitigation measures in offsetting impacts to special-status species as a result of water conveyance facility construction. In some cases the proposed mitigation acreages do not meet the stated CEQA mitigation ratios commonly used to offset impacts to individual species. In other cases, the same mitigation action (for example riparian habitat restoration) is proposed as a mitigation measure for multiple species with a wide range of specific habitat requirements. These species requirements are, in some cases, so disparate that one project or mitigation commitment cannot be tailored to both species (for example least Bell's vireo and special-status bats).	

			<p>CDFW staff reiterates these comments again in the context of Section 5, Cumulative Impacts. When taken together, across all cumulative impacts to special status species in the Delta, even a slight difference between standard mitigation acreage requirements under CEQA and those proposed for this project, or partial inadequacy in the ability of proposed mitigation to meet species-specific requirements, are likely to result in adverse impacts under the preferred alternative 4A.</p>	
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